



August 13, 2024

njdnef_martinotti@njd.uscourts.gov
Honorable Judge Brian R. Martinotti
United States District Judge for the District of New Jersey

Re: Insulin Pricing Litigation
2:23-md-03080-BRM-RLS

Dear Judge Martinotti,

We write pursuant to this Court's Order dated July 15, 2024 (ECF 229) regarding the pre-motion letter filed by the States of Indiana and Louisiana (ECF 224) and the State of Mississippi's responsive letter (ECF 227). Indiana and Louisiana seek to have their common outside counsel (Robert L. Salim of Salim-Beasley LLC) appointed as additional "Co-Lead Counsel" for the State AG Track, as detailed in Case Management Order #3 ("CMO3)." In response, Co-Lead Counsel representing the State of Mississippi indicated that they do not oppose the request, but requested time to confer with Indiana and Louisiana, a request which request the Court granted.

Over the last several weeks, the Attorneys General of Indiana, Louisiana, and Mississippi conferred to determine the best leadership structure for outside counsel. Currently, all States currently on file except Indiana and Louisiana have their outside counsel designated as Co-Lead Counsel pursuant to CMO3.

The Attorneys General agree that each State's equal status as a sovereign entity entitles it to the full measure of representation in this MDL. The Attorneys General also agree that each of them has both a duty and the prerogative as the elected constitutional officer representing each State to retain counsel of their choosing, subject to the Rules of Professional Conduct and this Court's inherent authority over attorneys practicing before it.

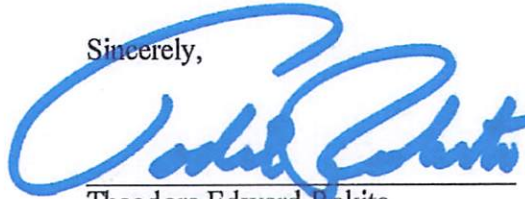
Accordingly, Indiana and Louisiana jointly request that this Court appoint Robert Lyle Salim as additional Co-Lead Counsel for the State Attorney General Track, with the duties and responsibilities outlined in CMO3. Indiana and Louisiana having common outside counsel makes this request less complicated and indeed more efficient than any other arrangement. Louisiana, Indiana, and Mississippi all have assigned high-level internal staff to this matter and are receiving regular briefings, as it is a matter of great importance to all of us. It is our understanding that

njdnef_martinotti@njd.uscourts.gov
Honorable Judge Brian R. Martinotti
United States District Judge for the District of New Jersey
August 13, 2024

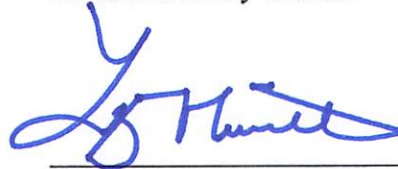
Attorney General Fitch does not object to this structure. We have not heard any concerns expressed from any other state.

The States expect a successful working relationship between all counsel to move this important litigation forward.

Sincerely,



Theodore Edward Rokita
Indiana Attorney General



Elizabeth Murrill
Louisiana Attorney General